

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	BANKRUPTCY CASE NO.: 09-15390-ELF
)	
Eric W. Vogt,)	CHAPTER 13
)	
Debtor.)	RELATED TO DOCKET NO. 14
_____)	_____
)	
Chase Home Finance, LLC,)	
)	
Objecting Party,)	
)	
vs.)	
)	
Eric W. Vogt, Debtor, and William Miller,)	
Trustee,)	
)	
Respondents.)	

**OBJECTIONS BY CHASE HOME FINANCE, LLC TO
CONFIRMATION OF CHAPTER 13 PLAN**

Chase Home Finance, LLC, (hereinafter “Chase”), by and through its attorneys, Grenen & Birsic, P.C., respectfully represents as follows:

1. This case was filed on or about July 23, 2009. No confirmation hearing has been scheduled as of this writing.
2. Chase is a party-in-interest in this case, by reason of a mortgage that it holds on the Debtor’s personal residence located at 711 Lincoln Avenue, Willow Grove, PA 19090
3. Chase will be filing a claim, listing total arrears as of the date of the bankruptcy filing in the amount of \$1,158.86.
4. The Debtor has filed a plan dated August 25, 2009.

5. The Debtor's plan is completely silent on the treatment of the arrears due to Chase.
6. The plan is, therefore, under-funded and Chase does not consent to this treatment. Chase is entitled to receive the full amount of its arrears as a condition to the cure and reinstatement of the mortgage.
7. Based on the foregoing, Chase does not consent to confirmation of the Debtor's plan.

WHEREFORE, Chase respectfully requests that this Court deny confirmation of the proposed plan.

Respectfully submitted,

GRENN & BIRSIC, P.C.

By: /s/ Jodi L. Hause
Jodi L. Hause, Esquire
PA ID No. 90625
Attorney for Chase Home Finance, LLC
One Gateway Center, 9th Floor
Pittsburgh, PA 15222
412-281-7650